

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:	X	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	:	
	X	

**JOINT INFORMATIVE MOTION REGARDING ARGUMENT AT SEPTEMBER 16-17,
2020 HEARING ON URGENT MOTION OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO LIFT STAY TO ALLOW COMMITTEE
TO PURSUE OBJECTION TO GO PRIORITY**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors (the “Committee”)², Ambac Assurance Corporation (“Ambac”, together with the Committee, the “Supporting Parties”), and the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board” or “Objecting Party”), respectfully submit this joint informative motion pursuant to the Court’s

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

Order Regarding Procedures for September 16-17, 2020, Omnibus Hearing [Case No. 17-3283, Docket No. 14202] (the “Scheduling Order”) and respectfully state as follows:

1. The below parties will appear telephonically at the September 16, 2020 hearing to address the *Urgent Motion of Official Committee of Unsecured Creditors to Lift Stay to Allow Committee to Pursue Objection to GO Priority* [Case No. 17-3283, Docket No. 13726] (the “Motion”) as well as any and all objections, responses, statements, joinders, and replies to the Motion.

2. The following individuals may appear and speak on behalf of the parties:

- a. Committee: Luc Despins of Paul Hastings LLP [Docket Nos. 13726 and 14237]
- b. Oversight Board: Martin Bienenstock and/or Brian Rosen of Proskauer Rose LLP [Docket No. 14141]
- c. Ambac: Atara Miller of Milbank LLP [Docket No. 14142]

3. The parties understand the Court has allocated 20 minutes for argument on the Motion to be split evenly between the Supporting Parties and the Objecting Party. The parties have agreed to allocate such time as follows:

- a. Supporting Parties’ opening arguments (8 minutes):
 - i. Committee: 6 minutes
 - ii. Ambac: 2 minutes
- b. Objecting Party’s arguments (10 minutes):
 - i. Oversight Board: 10 minutes
- c. Supporting Parties’ rebuttal arguments (2 minutes):
 - i. Committee: 2 minutes

WHEREFORE, the parties respectfully request that the Court take notice of the above.

Dated: September 14, 2020

/s/ Luc A Despins

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